



December 13, 2018

Reference No. 11187072

Mr. Gary Baumgarten
United States Environmental Protection Agency
Region 6
1448 Ross Ave. Suite 1200
Dallas, Texas 75202

**Re: Submission Date - Draft Second Phase Pre-Design Investigation Work Plan and Draft
Treatability Study Work Plan
San Jacinto River Waste Pits Superfund Site
Channelview, Texas
CERCLA Docket No. 06-02-18**

Dear Mr. Baumgarten:

This letter serves as follow up to the meeting conducted between representatives of International Paper Company (IP) and McGinnes Industrial Maintenance Corporation (MIMC) (collectively, the Respondents) and the United States Environmental Protection Agency (EPA) on December 10, 2018 at the EPA offices in Dallas, Texas in regards to the San Jacinto River Waste Pits Superfund Site (Site). The intent of the meeting was to introduce GHD Services, Inc. (GHD) as the new Supervising Contractor for the Remedial Design and to discuss the Second Phase Pre-Design Investigation (PDI) Work Plan and Treatability Study Work Plan (TSWP). During the meeting, the EPA and the Respondents discussed the technical elements of the currently ongoing First Phase PDI, the Second Phase PDI Work Plan, and the TSWP, as well as the value of engaging the EPA Technical Working Groups (TWG) early on in the design process.

As previously raised in Respondents' email dated November 2, 2018 and in our December 7, 2018 correspondence, the Respondents are requesting a schedule extension for submittal of the Second Phase PDI Work Plan and a submission date for the TSWP of February 11, 2019. This will allow the results of the First Phase PDI to be utilized in preparing the Second Phase PDI WP and the TSWP. The Respondents are committed to making good faith efforts to ensure that the extension does not impact the overall Remedial Design schedule. As discussed at the meeting on December 10, 2018, the February 11, 2019 submission date will eliminate the challenges that would be presented by attempting to develop effective Work Plans in the absence of complete First Phase PDI data and will therefore result in improved, more informed Work Plans that leverage the results from the First Phase PDI. Examples of why the results of the First Phase PDI are needed before these deliverables are submitted include the following:

- The First Phase PDI data are needed to identify data gaps to be addressed by the Second Phase PDI with respect to both analytical sampling and geotechnical sampling.



- Additional analytical sampling may be needed to delineate the vertical and horizontal limits of the contamination, particularly with respect to the Southern Impoundment, and there also may be a need for step-out sampling in specific locations.
- Depending on the results of the First Phase PDI geotechnical sampling, there may also be a need for additional geotechnical sampling to ensure that data needed for performing slope stability analyses of the clay soils in both the Northern and Southern Impoundments are available.
- The TSWP will identify approaches to stabilizing and treating waste material. Chemistry data from the First Phase PDI will provide information about the dioxin concentrations of the waste and that information will be used in identifying and defining the different approaches to be evaluated. In addition, information about hydraulic conductivity based on the results of geotechnical sampling will be used for the purposes of developing the TSWP.

If the TSWP or the Second Phase PDI WP were to be submitted prior to receipt of the First Phase PDI results, both Work Plans would then be expected to require significant revisions prior to field implementation in order to incorporate findings from the First Phase PDI and to address data gaps. The Respondents believe that modifying the submission date of the Work Plans will result in overall schedule efficiency for the Remedial Design.

As noted above, the Respondents remain committed to completing the Remedial Design as efficiently as possible and will coordinate with the EPA to identify opportunities for schedule optimization. Examples of proposed opportunities include the following:

- Following the submittal of the draft Work Plans, the Respondents plan to meet with the EPA to review comments to expedite the transition from draft to final Work Plans.
- The Respondents plan to utilize the TWGs in January 2019 to evaluate key technical items in the Remedial Design and expedite the overall schedule.

Should you have any questions regarding this submittal, please contact the undersigned at (225) 292-9007 or Mr. Philip Slowiak of IP at (901) 419-3845 or Ms. Judy Armour of MIMC at (770) 409-7406.



Sincerely,
GHD

A handwritten signature in black ink, appearing to read "C. W. Munce", written in a cursive style.

Charles W. Munce, P.E.

JTS//kdn/8

cc: Philip Slowiak, International Paper Company
Judy Armour, McGinnes Industrial Maintenance Corporation